

JAN 13 1995

OFFICE OF  
PUBLIC AFFAIRS

COMMENTS BY ALDERMAN CRAIG A. TARPOFF

I begin my comments with a reminder of the purpose of public comment. During the first comment period, hundreds of citizens, through petition or individual letters opposed the U.S. EPA's proposed remedy for the NL/Taracorp Superfund site. Many of us are disgusted with the arrogant "we know what's best for you" attitude exhibited by the U.S. EPA as you talk down to us. Many of the original commentators will not be commenting this time as they consider it to be a waste of time. In a democratic society, the citizens should not feel disconnected by their government.

As an elected official, I have received a number of calls from citizens who have felt forced into consent by the U.S. EPA. The threat of deed restrictions and court action against innocent individuals, by the federal government, are but two examples of what motivates citizens to remove from office those representatives who grant this kind of power to federal agencies. The ultimate public comment, the election process, will hopefully bring the necessary reforms to Superfund.

In federal court, the parties were led to believe that in mid-October the U.S. EPA would be opening the public comment period for all aspects of the clean-up. It is inconceivable that you still have no proposal regarding the waste pile. In the early 1980's,

IEPA identified ground water contamination and sub-soil contamination at the top of the ground water, clear signs of leaching. When the U.S. EPA took over the site, these studies were ignored and you assumed the position that there was no sign of ground water contamination. In the fall of 1991, U.S. EPA gave me permission to approach industries who might have an interest in recycling the pile as an alternative to capping. I thought then, as I do now, that it is the responsibility of the U.S. EPA to explore and validate alternatives at Superfund sites. In the summer of 1992, U.S. EPA finally recognized the ground water problems created by the waste pile; 2 1/2 years later you still have no proposal. Why has it taken so long to begin experiments to determine alternatives to capping? To clean-up residential properties adjacent to the pile and subject these properties to recontamination caused by capping or pile removal lacks common sense. We should be commenting on dust control and containment methods, but as of present there is no purpose in so doing. This is but one more reason why the U.S. EPA should withdraw from taking any action.

To date, the only credible evidence available regarding lead exposure in the Granite City area is found in the Health Study done by the Illinois Department of Public Health. The results of the study indicate that very little blood lead reduction will occur

from a massive soil removal program. Instead, if remediation efforts are directed to home interiors, i.e. paint and dust abatement, much greater blood lead reductions will occur.

As a participant in discussion groups convened for the development of the Title 10 403 rules, it was clear that even U.S. EPA recognized the limited benefit of very costly soil removal projects. Soil removal is not required for HUD housing until soils exceed 4,000 ppm. These rules recognize that setting lower soil removal levels would misdirect remediation dollars away from home interiors where paint and dust abatement is needed.

In addition, the "Urban Soil Lead Abatement Demonstration Project", the Three City Study, was an effort to prove the benefit of soil removal, which efforts failed. The results have been very embarrassing to those within U.S. EPA who have pushed the agenda of soil removal. Two of the cities showed no reduction in blood leads; the third had an insignificant reduction.

Through the wizardry of statistical manipulation, U.S. EPA issued a multi-volume review draft of the Three City Study, claiming significant blood lead reductions due to soil removals. Nearly all who reviewed this report disagreed with U.S. EPA's conclusions. Over a year has passed and still no final report.

U.S. EPA Region V has included as evidence of the benefits of soil removals a report regarding the Bunker Hill site in Idaho.

There is no question that revegetating the barren landscape and soil abatement has had some degree of benefit regarding blood leads, however, any attempt to credit all of the blood lead reductions to these efforts is ludicrous. We know, from the IDPH Health Study, that education and follow-up counseling, as was done in Bunker Hill, is very effective at reducing blood lead levels. Furthermore, upon reviewing the data found in NHANES II, HHANES, and NHANES III Phase I, all segments of the population have experienced major reductions in blood leads over this same time period. Therefore, it is fair to deduce that the reduction in blood leads among study participants at the Bunker Hill site is consistent with the national trend, and is not totally related to the soil lead program.

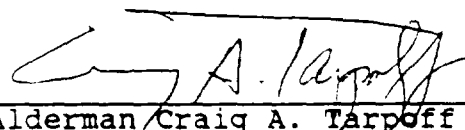
U.S. EPA's continued push for soil removals is based on its' overdependence on the IEUBK model. This model has never been validated or subjected to external scientific review. This model grossly overestimates the soil-lead, blood lead relationship, resulting in unnecessary remediation. How accurate was the model in Aspen, Colorado or Sandy, Utah? When I asked Mr. Brad Bradley, remedial project manager, why no value was placed in the model for paint, he responded "If we included paint in the model we would need to clean the soils down to 200 ppm". I fail to see the logic in this statement, because to me you don't address a lead paint

problem by digging up more dirt!

Hypothetically, assume that Hoyt Metals, National Lead, and Taracorp never existed in Granite City. As a Health investigator, you came to town to find elevated blood leads. Where would you look? Would you look in new subdivisions? Would you look in trailer courts? Would you look in older neighborhoods that were owner occupied with well maintained homes and thick carpet-like yards? I don't think so. I think you would look in areas where many older homes were in poor condition, where many homes were rental, where many residing had income and education levels below average, where the vast majority of the homes had high lead paint inside and out. These are the areas you would expect to find elevated blood leads, and this is true for Granite City.

Unless the complex exposure to lead is addressed in a multimedia remediation program, no U.S. EPA remediation strategy will meaningfully reduce blood leads.

Respectfully submitted,

A handwritten signature in dark ink, appearing to read "Craig A. Tarpoff", is written over a horizontal line.

Alderman Craig A. Tarpoff  
2621 Madison Avenue  
Granite City, IL 62040

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